

EXHIBIT 2

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 3:07-cv-5944-JST
MDL No. 1917

CLASS ACTION

This Document Relates to:
All Indirect Purchaser Actions

**ADDITIONAL DECLARATION OF
CHRISTOPHER T. MICHELETTI IN
SUPPORT OF PLAINTIFFS' APPLICATION
FOR ATTORNEYS' FEES, EXPENSES AND
INCENTIVE AWARDS**

Hearing Date: March 15, 2016
Time: 2:00 p.m.
Judge: Honorable Jon S. Tigar
Court: Courtroom 9, 19th Floor
Special Master: Martin Quinn, JAMS

1 I, Christopher T. Micheletti, declare as follows:

2 1. I am an attorney licensed to practice before the courts of the State of California, the
3 United States District Courts for the Northern and Central Districts of California, and the United
4 States Courts of Appeal for the Sixth, Seventh and Ninth Circuits. I am a partner in the law firm
5 Zelle Hofmann Voelbel & Mason LLP (“Zelle”). I make this declaration based upon my own
6 personal knowledge, based upon a review of the time, expense and other records of Zelle, and
7 based upon a review of the docket, pleading and other filings in this matter. I make this
8 supplemental declaration in support of indirect purchaser plaintiffs’ attorneys’ and my firm’s
9 request for attorneys’ fees and reimbursement of litigation expenses.

10 2. My firm is counsel of record in this case, and represents court-appointed class
11 representative plaintiff Kerry Lee Hall, as well as named plaintiffs Michael Juetten and Chad
12 Klebs.

13 3. During the course of this litigation, my firm has been involved in extensive tasks
14 and activities on behalf of the indirect purchaser plaintiffs (“IPPs”). Many of these tasks are
15 described in my Declaration in Support of Plaintiffs’ Application for Attorneys’ Fees, Expenses
16 and Incentive Awards (Doc. No. 4073-3), filed September 23, 2015 (“Micheletti Decl.”),
17 paragraphs 6 - 35.

18 4. In general, Zelle’s roles in this litigation included advising and assisting Lead
19 Counsel, from the outset of the case through 2015, with the overall case strategy and direction;
20 handling key elements of defendants’ pleading motions, including oral argument; major
21 responsibilities for electronic or E-discovery, including discovery-related protocols and database
22 processes; supervision and pursuit of defendant and third party transactional data and related
23 discovery; primary responsibility, with Lead Counsel, for virtually all aspects of the class
24 certification proceedings in this matter, including expert work, briefing and oral argument; taking
25 numerous Rule 30(b)(6) and fact/merits depositions of a major defendant group; primary
26 responsibility, with Lead Counsel, for all the expert work in the case, including IPPs’ and
27 defendants’ class certification reports, merits reports and expert discovery; and, significant roles in

1 preparation for trial.

2 5. In connection with performing the above tasks, Zelle attorneys worked extensively
3 with numerous firms and their attorneys representing the IPPs, including, among others, Lead
4 Counsel, Trump, Alioto, Trump & Prescott, LLP, and a core group of supporting firms that
5 included Zelle, Kirby McInerney, LLP and Straus & Boies, LLP. Based upon my experience in
6 IPP cases, the work assignments handled by my firm and other IPP counsel were handled
7 efficiently, cooperatively and cohesively. In addition, my firm was involved in efforts to work
8 collaboratively and efficiently with the direct purchaser plaintiffs' ("DPPs") counsel (*i.e.*, while
9 DPPs were active in the case), and with the direct action plaintiffs' ("DAPs") counsel, in order to
10 avoid duplicative work and litigate the case efficiently for the IPPs. Based upon my experience in
11 IPP cases, IPP counsel were successful in increasing case efficiency through their efforts to work
12 collaboratively with other plaintiff groups.

13 6. Lead Counsel assigned major litigation tasks in this case to my firm—including, but
14 not limited to, the work described in paragraphs 3 and 4 above—based upon the specific
15 experience, special knowledge and expertise Zelle possessed in specific areas based on work in
16 prior cases, including, but not limited to, *In re: TFT-LCD (Flat Panel) Antitrust Litigation*, No. M
17 07-1827 SI, MDL No. 1827, N.D. Cal. (the "*LCDs Case*"), *In re Static Random Access Memory*
18 (*SRAM*) *Antitrust Litigation*, MDL No. 1819, N.D. Cal. (the "*SRAM Case*") and the *Microsoft I-V*
19 *Cases*, J.C.C.P. No. 4106 (San Francisco Super. Ct.). As a result, from May 2008 to March 2015,
20 Lead Counsel repeatedly and extensively conferred with Zelle regarding Zelle experiences and
21 successful strategies employed in the *LCDs Case* and other indirect purchaser cases involving
22 electronic component price-fixing claims. By so doing, Lead Counsel made efficient and effective
23 use of extensive and unique experience and valuable strategic insights Zelle possessed and that
24 would prove highly beneficial to the IPP classes and case prosecution, from the case inception to
25 final resolution. *See also* Micheletti Decl. ¶¶9, 11, 15, 26, 28 and 30 (referencing use of Zelle
26 prior case experience).

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this the
2 2nd day of November 2015, in San Francisco, California.

3 /s/Christopher T. Micheletti

4 Christopher T. Micheletti
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